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Attorneys for the Fire Victim Trustee

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UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

In re:

PG&E CORPORATION,

- and -

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

- ☐ Affects PG&E Corporation
- ☐ Affects Pacific Gas and Electric Company
- ☒ Affects both Debtors

** All papers shall be filed in the Lead Case, No. 19-30088 (DM).*

Bankruptcy Case No. 19 -30088 (DM)

Chapter 11

(Lead Case) (Jointly Administered)

**DECLARATION OF ROBIN J. REILLY IN
SUPPORT OF REORGANIZED DEBTORS
AND FIRE VICTIM TRUST'S JOINT EX
PARTE MOTION TO EXTEND, IN PART,
DEADLINE TO COMPLY WITH ORDER
ON MOTION OF WILLIAM B. ABRAMS
AUTHORIZING DISCOVERY REGARDING
ADMINISTRATION OF THE FIRE VICTIM
TRUST**

[No Hearing Requested]

1 I, Robin J. Reilly, pursuant to section 1746 of title 28 of the United States Code, hereby declare
2 under penalty of perjury that the following is true and correct to the best of my knowledge, information,
3 and belief:

4 1. I am employed as Managing Counsel, Corporate and Finance, in the Law Department at
5 Pacific Gas and Electric Company (the “**Utility**”), a wholly-owned subsidiary of PG&E Corporation
6 (“**PG&E Corp.**”) and, together with the Utility, the “**Reorganized Debtors**” in the above-captioned
7 chapter 11 cases. I have been employed in this role since May 1, 2021, and prior to such date I was
8 employed as Chief Counsel, Corporate and Finance. I have been employed as an attorney for the Utility
9 since June 2002. In my current role, I am responsible for supervising five attorneys, and advising leaders
10 on corporate governance, securities disclosure and finance issues.

11 2. This Declaration is submitted in support of the *Reorganized Debtors and Fire Victim*
12 *Trust’s Joint Ex Parte Motion to Extend, In Part, Deadline to Comply with Order on Motion of William*
13 *B. Abrams Authorizing Discovery Regarding Administration of the Fire Victim Trust* (the “**Joint**
14 **Motion**”) filed concurrently herewith, which seeks to extend the PG&E Fire Victim Trust’s (the “**FVT**”)
15 time to comply with the Court’s August 2, 2022 *Order on Motion of William B. Abrams Authorizing*
16 *Discovery Regarding Administration of the Fire Victim Trust* (the “**Discovery Order**”), solely with
17 respect to the disclosure and publication of the D&O Action Settlement, until October 3, 2022.

18 3. I am generally knowledgeable and familiar with the July 26, 2022 settlement agreement
19 (the “**D&O Action Settlement**”) entered into between the FVT, the Reorganized Debtors and certain
20 former officers and directors of the Reorganized Debtors. [REDACTED]

21 [REDACTED]
22 [REDACTED] I am authorized to submit this
23 Declaration on behalf of the Reorganized Debtors. The facts set forth in this Declaration are based upon
24 my personal knowledge, my review of relevant documents, and information provided to me by the
25 Reorganized Debtors’ other employees or the Reorganized Debtors’ legal, restructuring, and financial
26 advisors. If called upon to testify, I would testify to the facts set forth in this Declaration.

27 4. As set forth in the Joint Motion, the D&O Action Settlement contains terms and
28 provisions [REDACTED]

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[REDACTED]

5. Pursuant to 28 U.S.C. § 1746, I declare under the penalty of perjury that the foregoing is true and correct.

Dated: August 29, 2022

Respectfully submitted,

By: /s/ Robin J. Reilly
Robin J. Reilly